



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

September 14, 2022

BY ECF

The Honorable Katherine Polk Failla
United States District Judge
Southern District of New York
Thurgood Marshall U.S. Courthouse
40 Foley Square
New York, New York 10007

Re: *United States v. Pierre Girgis, 22 Cr. 6 (KPF)*

Dear Judge Failla:

The parties write jointly to respectfully request an adjournment of the September 16, 2022 status conference in the above-referenced case for approximately 60 days. As the Court is aware, defense counsel has been preparing for a death penalty trial, on which *voir dire* is scheduled to begin before Judge Broderick on October 11, 2022. The Government is also making a production later this week of materials related to a particular search warrant application, as discussed at the parties' last conference.

In light of the above, and to allow the defense to evaluate possible pretrial motions, the parties respectfully request that the Court adjourn the September 16, 2022 status conference for approximately 60 days to a date convenient to the Court. In addition, the Government respectfully request that the Court exclude time under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A), from September 16, 2022, to and including the date set by the to allow the defense to review discovery, the defense to evaluate possible pretrial motions, and the parties to discuss a possible pretrial disposition. Counsel for the defendant consents to this request.

Respectfully submitted,

DAMIAN WILLIAMS
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cc: Andrew Dalack, Esq. (by ECF)